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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, CR No.: 06-0672 WHA

Plaintiff,

v.

STIPULATION AND ORDER ~~[Proposed]~~

STEVEN DONNELLY,
Defendant.

The United States, through its counsel Assistant United States Attorney, Robin L. Harris, and defendant Steven Donnelly, through his counsel Assistant Federal Public Defender Josh Cohen, hereby stipulate to the following:

1. On December 5, 2006, the parties appeared before the Court for a status conference. At that time, the defendant requested certain documents and information from the University of California, San Francisco (UCSF) which the parties believe will assist them in calculating a loss figure. The United States is attempting to obtain from UCSF the information requested by the defendant.

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STIPULATION AND ORDER ~~[Proposed]~~
[CR 06-06720] [WHA]

2. The United States and the defendant jointly agree that both parties will need to review this information, if it exists, to arrive at a negotiated disposition of this case.

3. In recognition of the parties' joint need for information currently believed by the parties to be in the custody and control of UCSF and the unavailability of counsel for the United States on January 9, 2007, the United States and defendant Donnelly agree and stipulate to a one-week continuance of the change of plea and/or trial setting conference from January 9, 2007 until January 16, 2007 at 2:00 p.m.

4. The parties further stipulate that the time from December 5, 2006 through January 16, 2007 is excludable under the Speedy Trial Act based upon the complexity of this case for the reasons stated on the record on December 5, 2006 and for the continued continuity of counsel.

Accordingly,

IT IS HEREBY STIPULATED AND AGREED by and between the United States and defendant Donnelly and his counsel, that the change of plea or trial setting conference shall be continued for one week from January 9, 2007 until January 16, 2007 at 2:00 p.m. The parties further stipulate that the time from December 5, 2006 through January 16, 2007 is excludable under the Speedy Trial Act based upon the complexity of this case for the reasons stated on the record on December 5, 2006 and for the continued continuity of counsel.

DATED: December 12, 2006

KEVIN V. RYAN
United States Attorney

/S/ Robin L. Harris
ROBIN L. HARRIS
Assistant United States Attorney

DATED: December 12, 2006

/S/ Josh Cohen
JOSH COHEN
Assistant Federal Public Defender

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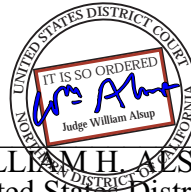
STIPULATION AND ORDER [Proposed]
[CR 06-06720] [WHA]

ORDER

IT IS HEREBY ORDERED based upon the above stipulation between the United States and defendant Donnelly and his counsel, that the change of plea or trial setting conference in this case shall be continued for one week from January 9, 2007 until January 16, 2007 at 2:00 p.m. The Court further finds that the time from December 5, 2006 through January 16, 2007 is excludable under the Speedy Trial Act based upon the complexity of this case for the reasons stated on the record on December 5, 2006 and for the continued continuity of counsel.

IT IS SO ORDERED.

DATED: December 14, 2006



WILLIAM H. ALSUP
United States District Court Judge